



Compliance Certification

NR 445 Technical Advisory Group
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Objective

- ◆ To create a compliance certification process that would:
 - ◆ streamline implementation for new NR 445 standards & requirements;
 - ◆ reduce the need to issue construction permits;
 - ◆ eliminate the need to reopen operation permits;
 - ◆ maintain enforceability of rule



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Availability

- ◆ Any source that must undertake a compliance activity with the exception of those:
 - ◆ needing to demonstrate BACT or LAER
 - ◆ requesting a variance from LAER or RfC



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Timing

- ◆ Existing Sources
 - ◆ Must complete compliance activity & submit certification no later than 36 months after effective date of the rule revision
 - ◆ Applicable standards & recordkeeping will be rolled into operation permit upon permit renewal
- ◆ New/modified sources not needing a permit for other reasons
 - ◆ Must construct/operate in conformance with standards & submit certification by start up



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Content

- ◆ Certification would contain:
 - ◆ statement that source is meeting standard(s)
 - ◆ which chemicals have PTE above threshold values
 - ◆ means of compliance
 - ◆ what records source will keep
- ◆ Records kept on-site must be of sufficient detail to support related compliance activity



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Examples of Compliance Activities That May Be Certified (eventually will be rolled into permit)

- ◆ Limitations on
 - ◆ hours of operation
 - ◆ material use
- ◆ Using compliance demonstrations methods to show concentrations are below applicable standards
 - ◆ dispersion modeling
 - ◆ In-stack testing or monitoring



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Examples of Compliance Activities That Do Not Need To Be Certified

- ◆ Elimination/substitution of material
- ◆ Re-configuring exhaust ventilation
 - ◆ raising stacks
 - ◆ routing exhaust
 - ◆ removing stack obstructions
- ◆ Using an exemption



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Sample Certification Letter

Source Name & FID

Chemical: toluene

Compliance demonstration:

Maximum daily use of toluene at facility will be limited to 1900 lbs. in order to remain below the 40 ft stack threshold of 79.3 lbs/hr.

Daily records calculating use will be kept and made available upon request. (Sample calculation provided)